

### **REMARKS/ARGUMENTS**

Claims 1–48 are pending in this application. New claims 27–48 have been added to more specifically claim the invention. Claims 1–2, 5, 10, 15, 20, 21, and 26 have been amended to make editorial changes. The new and amended claims are each fully supported by the specification, and no new matter has been added.

#### **Rejections under 35 U.S.C. § 102**

Claims 1-26 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 5,930,764 (Melchione). Reconsideration of the rejections set forth in the office action dated July 19, 2005 is respectfully requested.

#### *1. Independent claims 10, 15, 20, 21, and their respective dependents*

Independent claim 10 recites a method for analyzing direct marketing subscription information. The method includes denormalizing the summarization of transition table format information to produce a plurality of denormalized information. The denormalizing includes populating selected information from at least one of a plurality of facts tables to a key table. The facts tables are stored in a facts table database, and include at least one of a source category table, a source table, a campaign table, and a panels table. Denormalizing also includes propagating the selected information from one table to another. A report is provided based upon the denormalized information. This report references the key table and not the facts tables.

It is respectfully submitted that among other deficiencies of Melchione, Melchione fails to teach of a plurality of facts tables that include a source category table, a source table, a campaign table, or a panels table. The examiner has argued that Melchione describes, “The database has myriad tables that include customer demographic and financial data as well as product information, all of which are used to generate lead tables and campaign tables.” See page 4 of the office action.

However, in the passages of Melchione cited by the examiner as teaching of such a feature, Melchione describes a central database that includes information about all customers and products in a financial institution and the ability to generate a list of leads for marketing campaigns. There is no teaching or suggestion that a plurality of facts tables (stored in a facts table database) from which information is populated to a key table includes a source category

table, a source table, a campaign table, or a panels table. Melchione does not disclose or suggest storing a list of leads for marketing campaigns as a table in a facts table database or anywhere else. The central database of Melchione is not taught as including any of the tables as recited in claim 10. Accordingly, claim 10 is believed to be allowable over Melchione for at least this reason.

The report of claim 10 is provided based upon denormalized information, and references the key table and not any of a plurality of facts tables that are stored in a facts table database. The examiner has argued that Melchione provides a report based upon denormalized information. Melchione appears to describe generating a report by running the results of a query (Melchione, column 26 at lines 62–65) and generating a report containing an optimum list of leads for a marketing campaign by running a query against a central database (Melchione, column 27 at lines 38–41). But, the applicants respectfully submit that there is no indication that these reports are generating based upon denormalized information. In addition, Melchione does not appear to disclose or reasonably suggest that a report based upon denormalized information references a **key table and not any of a plurality of facts tables**. As such, claim 10 is believed to be allowable over Melchione for at least these additional reasons as well.

Claims 11–14 and 27 each depend either directly or indirectly from independent claim 10. Therefore, each of these dependent claims is believed to be allowable over the cited art for at least the reasons set forth above with respect to claim 10. Each of these dependent claims recites additional limitations which, when considered in light of claim 10, are believed to further distinguish the claimed invention over the cited art. For example, claim 27 recites that a “key table is the only table referenced by a report.” Melchione does not disclose or suggest that a report is generated such that a key table is the only table referenced. Accordingly, claim 27 is believed to be allowable over Melchione for at least this additional reason.

Independent claims 15, 20, and 21 recite similar limitations as recited in claim 10. As such, claims 15, 20, and 21, and their respective dependents are each believed to be allowable over the cited art for at least similar reasons to those set forth above with respect to claim 10.

## *2. Independent Claim 1 and its dependents*

Claim 1 recites a method for analyzing direct marketing subscription information. The method includes denormalizing a summarization of transition table format information to produce a plurality of denormalized information. Denormalizing involves propagating information from one table to another. The method also includes providing a report based upon the denormalized information that is provided to a user via a browser application.

The examiner has argued that Melchione teaches the limitations of claim 1. Applicants respectfully disagree. Claim 1 recites that a report is provided to a user via a browser application. While Melchione appears to disclose that a user can generate reports by running a query against a central database (Melchione, column 26 at lines 62–65 and column 27 at lines 38–41), there is no teaching or suggestion that such a report is provided to a user via a browser application. Therefore, claim 1 is believed to be allowable over Melchione for at least this reason.

Further, claim 1 recites that a report is based upon denormalized information. The examiner has argued that Melchione teaches of providing a report based upon denormalized information. However, although Melchione appears to describe generating a report by running the results of a query (Melchione, column 26 at lines 62–65) and generating a report containing an optimum list of leads for a marketing campaign (Melchione, column 27 at lines 38–41), it is respectfully submitted that there is no indication that these reports are generating based upon denormalized information.

Claims 2–9 and 26 each depend either directly or indirectly from independent claim 1 and are, therefore, each believed to be allowable over the cited art for at least the reason set forth above with respect to claim 1. Each of these dependent claims recites additional limitations which, when considered in light of claim 1, are believed to further distinguish the claimed invention over the cited art. For example, claim 26 recites appending a facts database with additional direct marketing subscription information in a transition table format.

Though the examiner broadly argues on page 6 of the office action that claim 26 recites substantially similar subject matter to claims 10–14, the examiner has not addressed appending a facts database with additional direct marketing subscription information in a transition table format. Since applicants do not believe Melchione teaches this limitation, claim 26 is believed to be allowable over Melchione for at least this additional reason as well.

### **CONCLUSION**

In view of the foregoing, the applicants believe all claims now pending in this application are in condition for allowance and an action to that end is respectfully requested. If the examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at (408) 701-0035.

Respectfully submitted,

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